



U.S. Department of Justice

*United States Attorney
Southern District of New York*

Application granted. The Clerk of Court is respectfully directed to terminate the pending letter-motion (Doc. 126).

SO ORDERED.

Philip M. Halpern
United States District Judge

Dated: White Plains, New York
February 26, 2025

The Honorable Philip M. Halpern
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

**Re: *United States v. Jamie and Nicholas Orsini,*
23 Cr. 402 (PMH)**

Dear Judge Halpern:

The Government writes respectfully—with the consent of the defendants, Jamie and Nicholas Orsini—to request a two-week extension of its time to respond to the Orsinis' post-trial motions for a judgment of acquittal, or, in the alternative, for a new trial, pursuant to Federal Rules of Criminal Procedure 29 and 33. (Docket Entries 105–06, 118–21).

As the Court is aware, on September 27, 2024, following a trial before this Court and a jury, the Orsinis were each convicted of one count of carjacking resulting in death, in violation of 18 U.S.C. §§ 2119(3) and 2, and one count of conspiracy to commit carjacking, in violation of 18 U.S.C. § 371. After the parties consulted with one another, Nicholas Orsini wrote to the Court and asked for a post-trial briefing schedule on consent: the Orsinis would immediately file their Rule 29 and 33 motions, but would file memoranda in support of those motions by December 13, 2024, and the Government would respond by February 28, 2025. (Docket Entry 103). This Court entered that schedule. (Docket Entry 104). The Orsinis followed the schedule, filing their post-trial motions the next day (Docket Entries 105–06), and memoranda on December 13, 2024 (Docket Entries 118–21).

The Government believes the Orsinis' motions are meritless and intends to oppose those motions. In light of the workload of the assigned AUSAs, however, the Government's response would be significantly more helpful to the Court if the Government had additional time to prepare its response. Accordingly, the Government respectfully requests that its time to respond to the Orsinis' motions be extended by two weeks to March 14, 2025. I have emailed with counsel for the Orsinis; Avraham C. Moskowitz, Esq. (counsel for Jamie Orsini) and Andrew G. Patel, Esq. (counsel for Nicholas Orsini) each consents to the request.

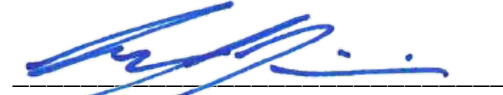
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February 25, 2025
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Please do not hesitate to contact me with any questions.

Respectfully submitted,

MATTHEW PODOLSKY
Acting United States Attorney

by:



Michael D. Maimin
Kaiya Arroyo
Kathryn P. Wheelock
Assistant United States Attorneys
Tel: (212) 637-2340 (Maimin)
(212) 637-2226 (Arroyo)
(914) 993-1966 (Wheelock)

cc: Bruce D. Koffsky, Esq. (by electronic mail and ECF)
Avraham C. Moskowitz, Esq. (by electronic mail and ECF)
Andrew G. Patel, Esq. (by electronic mail and ECF)
Donald J. Yannella, III, Esq. (by electronic mail and ECF)